



Complaint. (Dkt. No. 57). On November 29, 2018, Plaintiffs filed an unopposed motion for extension of time to respond to Defendants' motion to dismiss. (Dkt. No. 61). On November 30, 2018, Defendants filed an unopposed motion for extension of time to reply to Plaintiffs' response to their motion to dismiss, requesting December 21, 2018 as the deadline for Defendants' to file their reply. (Dkt. No. 63).

4. On December 4, 2018, Plaintiffs filed a second Motion for Temporary Restraining Order (Dkt. No. 66), as well as a separate Motion for Preliminary Injunction (Dkt. No. 67), requesting the Court enjoin Defendant from enforcing Section 3(l)(2) of Senate Bill 2465 against the Plaintiffs and from using cease and desist letters and other civil legal actions to stop the Plaintiffs' publication of digital firearms information. According to the Local Rules, Defendants' response to the Motion for Preliminary Injunction is due on December 11, 2018.

5. On December 6, 2018, the Court issued an order again denying Plaintiffs' request for a temporary restraining order "for the same reasons given in its prior order." (Dkt. No. 69). In particular, the Court stated that this case was the type of case that was "almost universally recognized as appropriate for abstention[:] . . . a state statute, not yet construed by the state courts, which is susceptible of one construction that would render it free from federal constitutional objection and another that would not." *Id.*

6. On December 6, 2018, the Court also granted Defendants' request to extend the deadline for their reply to Plaintiffs' response to Defendants' motion to dismiss to December 21, 2018.

7. On December 10, 2018, Defendants' counsel conferred with Plaintiffs' counsel seeking an agreement on an extension for Defendants to respond to the Motion for Preliminary Injunction from December 11, 2018 to January 11, 2019. Plaintiffs' counsel would not agree with

this requested extension, or any other requested extension, unless Defendant voluntarily agreed to the temporary restraining order that this Court had already denied.

8. Defendant seeks this extension for the following reasons:
  - a. the upcoming holidays and related vacation schedules for Defendants' counsel;
  - b. the current December 21, 2018 deadline for Defendants' to reply to Plaintiffs' December 12, 2018 response to Defendants' motion to dismiss; and
  - c. the length (28 pages), complexity and number of substantive issues raised in Plaintiffs' Motion for Preliminary Injunction.

9. The purpose of this opposed request for extension of time to answer Plaintiffs' Motion is not for delay, but rather to serve the interests of justice by allowing Defendants sufficient time to fully respond to the arguments raised in Plaintiffs' Motion for Preliminary Injunction and Plaintiffs will not be prejudiced by a short extension on a motion which essentially restates the same grounds for a preliminary injunction that were previously denied by this Court on November 13, 2018. (Dkt. No. 52).

NOW THEREFORE the Parties, by and through their counsel of record, respectfully request that the deadline for Defendant Gurbir Grewal, in his official capacity as the State of New Jersey's Attorney General to respond to Plaintiffs' Motion for a Preliminary Injunction (Dkt. No. 67) be extended from December 11, 2018 to January 11, 2019.

DATED: December 10, 2018.

Respectfully submitted,

**PILLSBURY WINTHROP SHAW PITTMAN LLP**

By: /s/ Casey Low

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**ATTORNEY FOR DEFENDANTS**

GURBIR GREWAL, in his official capacity as  
the State of New Jersey's Attorney General and  
MATTHEW DENN, in his official capacity as  
the State of Delaware's Attorney General

**VERIFICATION**

I hereby affirm that the allegations made by Defendant Gurbir Grewal, in his official capacity as the State of New Jersey's Attorney General are true and correct and represent the basis for the requested extension of time.

/s/ Casey Low  
Casey Low

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Casey Low  
Casey Low

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 10, 2018, counsel for Defendant Gurbir Grewal, in his official capacity as the State of New Jersey's Attorney General conferred with counsel for Plaintiffs regarding this request for motion. Plaintiffs are opposed to this motion.

/s/ Casey Low  
Casey Low